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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

DAVID REDMOND, an individual,

Plaintiff,

vs.

OFFICE DEPOT, INC., a corporation, and  
DOES One through 200,

Defendants.

Case No.: C-11-03314 RS

**STIPULATION AND [PROPOSED]  
ORDER TO VACATE AND  
RESCHEDULE EXPERT WITNESS  
DISCOVERY DEADLINES**

Pursuant to Local Rule 7-12, in the matter of *David Redmond v. Office Depot, Inc.*, Case No. C 11-03314-RS, counsel for Plaintiff David Redmond and counsel for defendant Office Depot, Inc., ("Office Depot") jointly submit the following Stipulation agreeing to vacate and reschedule the current deadlines for completing expert witness discovery.

WHEREAS, a trial date has not been set in this matter;

WHEREAS, at the Initial Case Management Conference on October 20, 2011, the Court indicated that a trial date would be scheduled at the next Case Management Conference, set for June 7, 2012, with the date of trial scheduled in approximately March 2013, at the earliest;

WHEREAS, the plaintiff and defendant agree that extending the deadlines for disclosure and discovery of expert witness opinions to dates closer to the anticipated pretrial conference and trial date, and after dispositive motions, is in the best interest of all parties and will not cause any delay in the prosecution of this action;

THEREFORE, the parties hereby stipulate and agree:

1. The Expert Witness deadlines set forth in the Case Management Scheduling Order, dated 10/21/11, are vacated.

2. The disclosure and discovery of expert witness opinions shall proceed as follows:

A. On or before October 12, 2012, plaintiff shall disclose expert testimony and reports in accordance with Federal Rule of Civil Procedure 26(a)(2).

B. On or before November 9, 2012, defendant shall disclose expert testimony and reports in accordance with Federal Rule of Civil Procedure 26(a)(2).

C. On or before November 30, 2012, all discovery of expert witnesses pursuant to Federal Rule of Civil Procedure 26(b)(4) shall be completed.

Date: 1/19/12

/s/ Hallie Von Rock

Hallie Von Rock

Attorney for Plaintiff David Redmond

Date: 1/19/12

/s/ Michael E. Brewer

Michael E. Brewer

Attorney for Defendant Office Depot, Inc.

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED:

1. The Expert Witness deadlines set forth in the Case Management Scheduling Order, dated 10/21/11, are vacated.
2. The disclosure and discovery of expert witness opinions shall proceed as follows:
  - A. On or before October 12, 2012, plaintiff shall disclose expert testimony and reports in accordance with Federal Rule of Civil Procedure 26(a)(2).
  - B. On or before November 9, 2012, defendant shall disclose expert testimony and reports in accordance with Federal Rule of Civil Procedure 26(a)(2).
  - C. On or before November 30, 2012, all discovery of expert witnesses pursuant to Federal Rule of Civil Procedure 26(b)(4) shall be completed.

Date: 1/19/12



Hon. Richard Seeborg